

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

UNITED STATES OF AMERICA,)	
<i>Plaintiff,</i>)	
v.)	23 CR 28
)	Honorable Edmond E. Chang
JEFF MCGRAW,)	
<i>Defendant.</i>)	

**UNOPPOSED MOTION FOR LEAVE TO FILE OVERSIZED REPLY
BRIEF**

NOW COMES the defendant, JEFF MCGRAW, by and through his attorney, YELENA A. DOLGOSHEEVA, and respectfully requests this Honorable Court for leave to file a reply brief in excess of 15 pages. In support of this motion, defendant states as follows:

1. On April 15, 2024, Mr. McGraw filed a Motion to Dismiss the Indictment on Second Amendment Grounds arguing that § 922(g)(1) is unconstitutional under *New York State Rifle & Pistol Ass’n, Inc. v. Bruen*, 142 S. Ct. 2111 (2022). R. 82.
2. On April 30, 2024, the government filed its Response Brief, which was in excess of 45 pages in length, and contained a number of arguments in opposition to Mr. McGraw’s motion. R. 87.
3. N.D. Ill. Local Rule 7.1 provides that a brief is limited to 15 pages unless the party obtains a prior court approval permitting oversized brief.
4. Counsel will require more than 15 pages to adequately address the arguments made in the government’s Response.
5. The government does not oppose this Motion.

WHEREFORE, counsel respectfully requests this Honorable Court for leave to file a reply brief in excess of 15 pages.

Respectfully submitted,
/s/ Yelena A. Dolgosheeva

DolTer Law, P.C.
Mailing Address: P.O. Box 5382, Buffalo Grove, Illinois 60089
Telephone: 847-208-4348
Fax: 312-267-1810
E-mail: dolgosheeva2002@yahoo.com